

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X	:	
	:	
SCREEN ACTORS GUILD - AMERICAN	:	
FEDERATION OF TELEVISION AND RADIO	:	
ARTISTS, NEW YORK LOCAL	:	
	:	
Plaintiff,	:	Civil No. 21/4972
	:	
-v-	:	
	:	
NEW YORK PUBLIC RADIO	:	
	:	
Defendant.	:	
-----X	:	

**EXHIBIT B TO COMPLAINT TO COMPEL ARBITRATION**



May 5, 2021

VIA E-MAIL ([MJefferson@nypublicradio.org](mailto:MJefferson@nypublicradio.org))

Monique Jefferson  
Chief Human Resources Officer  
New York Public Radio  
160 Varick Street, 7th Floor  
New York, NY 10013

**Subject: Grievance regarding WNYC's Failure to Pay Severance Pay to Fred Mogul**

Dear Ms. Jefferson,

Pursuant to Article XXI of the 2018-2022 SAG-AFTRA/WNYC collective bargaining agreement ("CBA"), please accept this letter as a written grievance of WNYC's failure to pay required Severance Pay to Fred Mogul. Without prejudice to any other outstanding SAG-AFTRA grievances related to Mogul or SAG-AFTRA's position regarding the proper remedy in those cases, SAG-AFTRA demands that as a remedy for this grievance WNYC pay Mogul Severance Pay pursuant to Article XXIII of the CBA.

Please advise of your availability for a grievance meeting over this issue

Sincerely,

A handwritten signature in black ink, appearing to read "JM" or "Joshua Mendelsohn".

**Joshua Mendelsohn**  
**Senior Labor Counsel, News and Broadcast**

CC: Richard Larkin ([Richard.Larkin@sagaftra.org](mailto:Richard.Larkin@sagaftra.org))  
Janna Freed ([jfreed@nypublicradio.org](mailto:jfreed@nypublicradio.org))  
Edward Lieber ([Lieber@kmm.com](mailto:Lieber@kmm.com))

Joshua Mendelsohn, Senior Labor Counsel, News and Broadcast  
Joshua.Mendelsohn@SAGAFTRA.ORG • SAGAFTRA.org • 212.863.4292  
SCREEN ACTORS GUILD - AMERICAN FEDERATION OF TELEVISION AND RADIO ARTISTS  
1900 Broadway, 5<sup>th</sup> Floor, New York, NY 10023  
Associated Actors & Artistes of America / AFL-CIO